

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	Chapter 11
	:	
FTX TRADING LTD., <i>et al.</i> , ¹	:	Case No. 22-11068 (KBO)
	:	
Debtors.	:	Jointly Administered
	:	
	:	Re: D.I. 34258

**JOINDER AND STATEMENT OF THE JOINT LIQUIDATORS
OF THREE ARROWS CAPITAL, LTD. (IN LIQUIDATION)
IN SUPPORT OF THE SEALING MOTION OF THE FTX RECOVERY TRUST**

Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives and joint liquidators (the “**Joint Liquidators**”) of Three Arrows Capital Ltd. (the “**3AC Debtor**”), respectfully submit this joinder and statement in support (this “**Joinder**”) of the *Sealing Motion of the FTX Recovery Trust* [D.I. 34258] (the “**Sealing Motion**”)² and state as follows:

JOINDER

1. The Sealing Motion seeks to maintain confidentiality over a limited set of Confidential Reply Materials that the Joint Liquidators identified as confidential or highly confidential on the basis that such materials constitute: (i) “confidential . . . commercial information,” within the meaning of 11 U.S.C. § 107(b)(1), that reveals non-public information regarding the 3AC Debtor’s estate that may be used by third parties to the detriment of such estate

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein have the meaning ascribed to them in the Sealing Motion.

and its creditors, and (ii) with respect to certain Confidential Reply Materials contained within Exhibit 2 of the Beller Reply Declaration, highly sensitive information, the disclosure of which “would create undue risk of . . . unlawful injury” to certain individuals, within the meaning of 11 U.S.C. § 107(c). As evidenced by the Sealing Motion, following review and good-faith discussions with the Joint Liquidators, the Trust has agreed to file the Confidential Reply Materials under seal.

2. The Joint Liquidators further submit that, in light of the sensitive and confidential nature of the Confidential Reply Materials, this Court also has authority to grant the relief sought in the Sealing Motion pursuant to 11 U.S.C. § 105(a), which provides in relevant part that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”

3. For these reasons, the Joint Liquidators hereby join in support of the relief the Trust seeks through the Sealing Motion and respectfully request that the Court authorize the Trust to redact or file under seal, as applicable, the Confidential Reply Materials.

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Dated: January 13, 2026
Wilmington, Delaware

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